

2011 Jun-06 PM 09:01  
U.S. DISTRICT COURT  
N.D. OF ALABAMA

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
NORTHEASTERN DIVISION**

**GEORGE R. CHAPMAN, JR.**

**Plaintiff,**

**VS.**

**CIVIL ACTION NO.:  
6:09-cv-1748-SLB**

**WALKER COUNTY, ALABAMA,  
et al.**

**Defendants.**

**DEFENDANTS' EVIDENTIARY SUBMISSIONS IN SUPPORT OF  
THEIR MOTION FOR SUMMARY JUDGMENT**

COME NOW the Defendants, Walker County, Alabama, Sheriff John Mark Tirey and Trenton McCluskey, in the above-styled cause, and submit the following Evidentiary Materials in support of their contemporaneously filed Motion for Summary Judgment:

- A Deposition of the Plaintiff, George R. Chapman, Jr.
- B Deposition of Sheriff John Mark Tirey
- C Deposition of Trenton McCluskey
- D Deposition of Rachel Harper
- E Letter of September 24, 2008 hiring the Plaintiff as a full-time jailer
- F Notice outside M-Dorm

- G Walker County Jail Policy and Procedure, Section 7, Title 7.12,  
Transportation of Inmates
- H Walker County Jail Policy and Procedure, Section 7, Title 7.09,  
Use of Force and Restraints
- I Letter from Trent McCluskey to Sheriff Tirey dated October 9,  
2008
- J Walker County Jail Policy and Procedure regarding Batons
- K Correspondence from Sergeant Rachel Harper to Trent  
McCluskey dated November 4, 2008
- L Correspondence from Trent McCluskey to Sheriff Tirey dated  
November 3, 2008
- M Statement of Sergeant Rachel Harper
- N Statement of Officer Killingsworth
- O Statement of Officer Tiffany Clifton
- P Statement of Officer Mary Phillips
- Q Statement of Inmate Jerald Kennedy
- R Statement of Inmate Donald May
- S Statement of Inmate Vester Stiles
- T Statement of Inmate George Bryant
- U Statement of Inmate Ralph Woods

- V Statement of Inmate Steven Garner
- W Statement of Inmate James Lawson
- X Statement of Inmate Ronald Grant
- Y Letter from Sheriff Tirey to the Plaintiff dated November 7,  
2008 terminating the Plaintiff

Respectfully submitted this the 6<sup>th</sup> day of June 2011.

/s/Kristi A. Dowdy

Kristi A. Dowdy (DOW016)

Attorney for Defendants

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### **CERTIFICATE OF SERVICE**

I hereby certify that on this the 6<sup>th</sup> day of June, 2011, I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will provide notice to the following CM/ECF participants: **John D. Saxon, Esq.**

/s/Kristi A. Dowdy

OF COUNSEL